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September 11, 2017

Via ECF

Hon. Lorna G. Schofield
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Re: The November Team, Inc., et al v. JCOPE, 16-CV-01739 (LGS)

Your Honor:

This firm, together with the Center for Competitive Politics, represents plaintiffs in the above-referenced action, and we write on behalf of all parties to provide a joint status letter in accordance with the Court's June 13, 2017 Order (ECF No. 62).

Since our last report to the Court on June 9, 2017, the Joint Commission on Public Ethics (JCOPE) voted to proceed with a formal rulemaking under the State Administrative Procedure Act. The rules are out for public comments which are due on October 16, 2017. In July, Plaintiffs, through counsel, submitted extensive comments on the proposed regulations, some of which involve the issues in the instant action. JCOPE is holding a public hearing on October 30, 2017. The current expectation is that the rules will be back before JCOPE at the Commission's November meeting. Another round of public comments is possible, which could have an effect on when the rules become final, but it is too soon to say for certain. The parties still anticipate final action on the regulations by early 2018.

Consistent with the June 13 Order, we will provide our next status report to the Court on the earlier date of either (i) December 11, 2017 or (ii) three days after either final action on the rules or after a filing in state court on this matter.

Respectfully submitted,

/s
Zoe Salzman